

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

COUNTY OF ALBANY, TOWN OF
AMHERST, COUNTY OF
CATTARAUGUS, COUNTY OF
CHEMUNG, COUNTY OF CHENANGO,
COUNTY OF COLUMBIA, COUNTY OF
ERIE, COUNTY OF ESSEX, COUNTY OF
LIVINGSTON, MAGNACARE
INSURANCE, MEBCO, CITY OF MOBILE,
COUNTY OF MONROE, COUNTY OF
ONEIDA, COUNTY OF ONONDAGA,
COUNTY OF OSCEOLA, COUNTY OF
OTSEGO, CITY OF POUGHKEEPSIE,
COUNTY OF SCHUYLER, COUNTY OF
SHELBY, WCA GROUP HEALTH TRUST,
COUNTY OF YATES,

Plaintiffs,

v.

ACTAVIS HOLDCO US, INC.;
ACTAVIS ELIZABETH LLC;
ACTAVIS PHARMA, INC.;
ALVOGEN INC.;
AMNEAL PHARMACEUTICALS, INC.;
AMNEAL PHARMACEUTICALS, LLC;
APOTEX CORP.;
AUROBINDO PHARMA USA, INC.;
BAUSCH HEALTH AMERICAS, INC.;
BAUSCH HEALTH US INC.;
BARR PHARMACEUTICALS, LLC;
BRECKENRIDGE PHARMACEUTICAL,
INC.;
CAMBER PHARMACEUTICALS, INC.;
CARACO PHARMACEUTICAL
LABORATORIES LTD.;
CITRON PHARMA LLC;
DAVA PHARMACEUTICALS, LLC;
DR. REDDY'S LABORATORIES, INC.;
ENDO INTERNATIONAL PLC; FOUGERA
PHARMACEUTICALS INC.; G & W
LABORATORIES;
GENERICS BIDCO I, LLC;

Civil Action No.: 21-cv-1650

NOTICE OF REMOVAL

Removed from:

Supreme Court of the State of New York,
County of Suffolk

GLENMARK PHARMACEUTICALS, INC.;
GREENSTONE LLC;
HERITAGE PHARMACEUTICALS, INC.;
HIKMA LABS, INC.;
HIKMA PHARMACEUTICALS, USA,
INC.;
IMPAX LABORATORIES, INC.;
JUBILANT CADISTA
PHARMACEUTICALS, INC.;
LANNETT COMPANY, INC.;
LUPIN PHARMACEUTICALS, INC.;
MAYNE PHARMA USA INC.;
MORTON GROVE PHARMACEUTICALS,
INC.;
MUTUAL PHARMACEUTICAL CO., INC.;
MYLAN INC.;
MYLAN PHARMACEUTICALS, INC.;
MYLAN N.V.;
OCEANSIDE PHARMACEUTICALS, INC.;
PAR PHARMACEUTICAL, INC.;
PERRIGO NEW YORK, INC.;
PFIZER, INC.;
SANDOZ, INC.;
SUN PHARMACEUTICAL INDUSTRIES,
INC.;
TARO PHARMACEUTICALS USA, INC.;
TELIGENT INC.;
TEVA PHARMACEUTICALS USA, INC.;
TORRENT PHARMA INC.;
UDL LABORATORIES, INC.;
UPSHER-SMITH LABORATORIES, LLC;
URL PHARMA, INC.;
VALEANT PHARMACEUTICALS NORTH
AMERICA, LLC;
VALEANT PHARMACEUTICALS
INTERNATIONAL, INC.; VERSAPHARM,
INC.;
WEST-WARD COLUMBUS, INC.;
WEST-WARD PHARMACEUTICALS
CORP.;
WOCKHARDT USA LLC; and
ZYDUS PHARMACEUTICALS (USA),
INC.,

Defendants.

PLEASE TAKE NOTICE that defendants Mylan Inc., Mylan Pharmaceuticals Inc., and UDL Laboratories, Inc. (collectively, the “Mylan Defendants”) hereby remove the above-captioned action from the Supreme Court of the State of New York, County of Suffolk, to the United States District Court for the Eastern District of New York.¹ This removal arises under 28 U.S.C. §§ 1331, 1337, 1367, 1441(a), and 1446. As grounds for removal, the Mylan Defendants state as follows:

INTRODUCTION

1. On December 15, 2020, plaintiffs commenced the present action by filing a Summons and Complaint captioned *County of Albany, et al. v. Actavis Holdco US, Inc., et al.*, Index No. 619573/2020, in the Supreme Court of the State of New York, County of Suffolk (the “State Court Action”). The Summons and Complaint in the State Court Action (hereinafter “Summons and Complaint”) are collectively attached as Exhibit A.

2. The Complaint alleges causes of action against each defendant for (1) breach of Sections 1 and 3 of the Sherman Act, 15 U.S.C. §§ 1 and 3, and Sections 4 and 16 of the Clayton Act, 15 U.S.C. §§ 15(a) and 26; (2) breach of the Donnelly Act, New York General Business Law § 340, *et seq.*; (3) unjust enrichment under New York law; (4) breach of Alabama Antitrust Statutes, Alabama Code § 6-5-60, *et seq.*; (5) unjust enrichment under Alabama law; (6) breach of the Florida Antitrust Statutes, Florida Statutes Combinations Restricting Trade and Commerce § 542, *et seq.*; (7) unjust enrichment under Florida law; (8) breach of Tennessee Antitrust Statutes, Tennessee Code § 47-25-101, *et seq.*; (9) unjust enrichment under Tennessee law; (10) breach of the Wisconsin Antitrust statutes, Wisconsin Statutes, Trust and Monopolies § 133, *et seq.*; and (11) unjust enrichment under Wisconsin law. *See* Compl. ¶¶ 4377–4549. Against each defendant the Complaint seeks a declaratory judgment; treble damages applied jointly and severally; damages in

¹ Defendant Mylan N.V. no longer exists due to a corporate transaction.

the form of restitution and/or disgorgement; restitution, including disgorgement of profits obtained through unjust enrichment; permanent injunction; pre- and post-judgment interest; costs of suit; and any such relief the court deems just and appropriate. *Id.* at Sec. XVI.

3. The Complaint relates to and is based on a common set of factual allegations made in several other pending complaints against the same defendants related to the manufacture and/or sale of generic pharmaceuticals in the United States that have been consolidated by the Judicial Panel for Multidistrict Litigation before The Honorable Cynthia Rufe in the United States District Court for the Eastern District of Pennsylvania. The multidistrict litigation is captioned *In Re Generic Pharmaceuticals Pricing Antitrust Litigation*, Case No. 2:16-md-02724-CMR. The plaintiffs' eleven causes of action arise out of alleged antitrust violations that are at issue in that multidistrict litigation. Compl. ¶ 4.

4. On March 9, 2021, the Summons and Complaint was served on: Fougera Pharmaceuticals Inc.

5. On March 10, 2021, the Summons and Complaint was served on: Camber Pharmaceuticals, Inc.; Heritage Pharmaceuticals Inc.; Hikma Labs Inc.; Hikma Pharmaceuticals USA, Inc. (f/k/a West-Ward Pharmaceuticals Corp.); Sandoz Inc.; Upsher-Smith Laboratories, LLC; West-Ward Columbus Inc; and West-Ward Pharmaceuticals Corp. (n/k/a Hikma Pharmaceuticals USA, Inc.).

6. On March 11, 2021, the Summons and Complaint was served on: Amneal Pharmaceuticals, Inc.; Amneal Pharmaceuticals, LLC; Apotex Corp.; Breckenridge Pharmaceutical, Inc.; Dr. Reddy's Laboratories, Inc.; Glenmark Pharmaceuticals, Inc.²; Impax

² The entity named in the complaint, "Glenmark Pharmaceuticals, Inc.," does not exist. Glenmark Pharmaceuticals Inc., USA accepted service with the understanding that plaintiffs will correct their pleadings to reflect the correct entity name. In accordance with Paragraph 19 *infra*, Glenmark Pharmaceuticals Inc., USA consents to the removal of this action to federal court.

Laboratories, Inc.; Jubilant Cadista Pharmaceuticals, Inc.; Lupin Pharmaceuticals, Inc.; Mayne Pharma USA Inc.³; Morton Grove Pharmaceuticals, Inc.; Mylan Inc.; Mylan Pharmaceuticals, Inc.; Pfizer Inc.; UDL Laboratories, Inc.; and Wockhardt USA LLC.

7. On March 12, 2021, the Summons and Complaint was served on: Alvogen, Inc.; Aurobindo Pharma USA, Inc.; Bausch Health Americas, Inc.; Bausch Health US Inc.⁴; Valeant Pharmaceuticals North America LLC n/k/a Bausch Health US, LLC; Oceanside Pharmaceuticals, Inc.; Par Pharmaceutical, Inc.; and Teligent Inc.

8. On March 15, 2021, the Summons and Complaint was served on: Actavis Elizabeth LLC; Actavis Holdco US, Inc.; Actavis Pharma, Inc.; and Zydus Pharmaceuticals (USA), Inc.

9. On March 16, 2021, the Summons and Complaint was served on: DAVA Pharmaceuticals, LLC and Sun Pharmaceutical Industries, Inc.

10. On March 17, 2021, the Summons and Complaint was served on: Barr Pharmaceuticals, LLC; Lannett Company, Inc.; and Torrent Pharma Inc.

11. On March 18, 2021, the Summons and Complaint was served on: Teva Pharmaceuticals USA, Inc.

12. On March 23, 2021, the Summons and Complaint was served on: Caraco Pharmaceutical Laboratories Ltd; Citron Pharma, LLC; and Perrigo New York, Inc.

³ The entity named in the complaint, “Mayne Pharma USA Inc.,” does not exist. Mayne Pharma Inc. accepted service with the understanding that plaintiffs will correct their pleadings to reflect the correct entity name. In accordance with Paragraph 19 *infra*, Mayne Pharma Inc. consents to the removal of this action to federal court.

⁴ The entity named in the complaint, “Bausch Health US Inc.,” does not exist. Valeant Pharmaceuticals North America LLC accepted service with the understanding that plaintiffs will correct their pleadings to reflect the correct entity name. In accordance with Paragraph 19 *infra*, Valeant Pharmaceuticals North America LLC consents to the removal of this action to federal court.

13. As reflected by the docket in the State Court Action and upon information and belief, no other defendant has been served as of the filing of this notice of removal.⁵ A copy of the docket entries in the State Court Action is attached as Exhibit B. Copies of all documents filed in the State Court Action other than the Summons and Complaint are attached as Exhibit C.

THIS COURT HAS FEDERAL QUESTION AND SUPPLEMENTAL JURISDICTION

14. This Court has original federal question jurisdiction over the plaintiffs' federal antitrust claims under 15 U.S.C. § 15(a) and 28 U.S.C. §§ 1331 and 1337. Because the Sherman Act is "subject to judicial interpretation solely by the federal courts," the "federal courts have exclusive jurisdiction over federal antitrust lawsuits." *Johnson v. Nyack Hosp.*, 964 F.2d 116, 122 (2d Cir. 1992).

15. This Court possesses supplemental jurisdiction over the plaintiffs' state law claims for unjust enrichment; breach of the Donnelly Act; breach of Alabama Code § 6-5-60, *et seq.*; breach of Florida Statutes Combinations Restricting Trade and Commerce § 542, *et seq.*; breach of Tennessee Code § 47-25-101, *et seq.*; and breach of Wisconsin Statutes, Trust and Monopolies § 133, *et seq.* under 28 U.S.C. § 1367(a) because those claims are interrelated with the federal antitrust claims, arise from the same common nucleus of operative facts as the federal claims, and therefore "form part of the same case or controversy under Article III of the United States Constitution." 28 U.S.C. § 1367(a).

⁵ On March 24, 2021, the Summons and Complaint was again served at the offices of Par Pharmaceutical, Inc. ("Par"). As noted above, Par and DAVA Pharmaceuticals, LLC had already been served. Due to remote working conditions, undersigned counsel has not yet received the additional Summons and Complaint or been able to verify the entity on which service was purportedly made on March 24th. In addition, the State Court Action docket indicates that Versapharm, Inc. was served on March 12, 2021. *See* Exhibit C at 98. However, upon information and belief, Versapharm, Inc. is in bankruptcy and therefore all lawsuits filed against that entity are subject to a mandatory stay. Finally, Valeant Pharmaceuticals International, Inc. is not an United States company, has no authorized agent for service in the United States, and has thus not been served.

16. This matter may therefore be properly removed to this Court on the basis of federal question and supplemental jurisdiction, as more fully explained below.

THE REQUIREMENTS OF 28 U.S.C. § 1446 ARE MET

17. This Notice of Removal is properly filed in the United States District Court for the Eastern District of New York because the Supreme Court for the State of New York, County of Suffolk, is located within the Eastern District of New York. Venue for removal is therefore proper because this is the “district and division embracing the place where such action is pending.” 28 U.S.C. § 1441(a); *see also* 28 U.S.C. § 112(c).

18. Mylan Defendants were served with the Summons and Complaint on March 11, 2021 and have therefore timely filed this Notice of Removal within 30 days of being served. *See* 28 U.S.C. § 1446(b)(1), (b)(2)(B).

19. Counsel for all defendants who have been served in the State Court Action have executed this Notice of Removal, indicating their consent to the removal of this action to federal court. These defendants include: Actavis Holdco US, Inc.; Actavis Elizabeth LLC; Actavis Pharma, Inc.; Alvogen, Inc.; Amneal Pharmaceuticals, Inc.; Amneal Pharmaceuticals, LLC; Apotex Corp.; Aurobindo Pharma USA, Inc.; Barr Pharmaceuticals, LLC; Bausch Health Americas, Inc.; Bausch Health US LLC; Breckenridge Pharmaceutical, Inc.; Camber Pharmaceuticals, Inc.; Caraco Pharmaceutical Laboratories Ltd.; Citron Pharma, LLC; DAVA Pharmaceuticals, LLC; Dr. Reddy’s Laboratories, Inc.; Fougera Pharmaceuticals Inc.; Glenmark Pharmaceuticals Inc.; Heritage Pharmaceuticals Inc.; Hikma Labs Inc.; Hikma Pharmaceuticals USA, Inc. (f/k/a West-Ward Pharmaceuticals Corp.); Impax Laboratories, Inc.; Jubilant Cadista Pharmaceuticals, Inc.; Lannett Company, Inc.; Lupin Pharmaceuticals, Inc.; Mayne Pharma USA Inc.; Morton Grove Pharmaceuticals, Inc.; Mylan Inc.; Mylan Pharmaceuticals, Inc.; Oceanside

Pharmaceuticals, Inc.; Par Pharmaceutical, Inc.; Perrigo New York, Inc.; Pfizer Inc.; Sandoz Inc.; Sun Pharmaceutical Industries, Inc.; Teligent Inc.; Teva Pharmaceuticals USA, Inc.; Torrent Pharma Inc.; UDL Laboratories, Inc.; Upsher-Smith Laboratories, LLC; Valeant Pharmaceuticals North America LLC n/k/a Bausch Health US, LLC; West-Ward Columbus Inc; West-Ward Pharmaceuticals Corp. (n/k/a Hikma Pharmaceuticals USA, Inc.); Wockhardt USA LLC; and Zydus Pharmaceuticals (USA), Inc. All defendants who have been properly joined and served have therefore agreed to removal. 28 U.S.C. § 1446(b)(2)(A), (C).

20. This Notice of Removal is signed pursuant to Rule 11 of the Federal Rules of Civil Procedure and true and correct copies of all process, pleadings, and orders served upon the Mylan Defendants are attached as Exhibits A–C. 28 U.S.C. § 1446(a).

21. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being served upon counsel for the plaintiffs and a copy, along with a Notice to Clerk of Removal, will be promptly filed with the Clerk of the Supreme Court of the State of New York, County of Suffolk.

CONCLUSION

22. For the foregoing reasons, this action is properly removed to this Court.

Dated: March 26, 2021

Of Counsel:

Benjamin F. Holt
Adam K. Levin
Justin W. Bernick
HOGAN LOVELLS US LLP
555 Thirteenth Street, NW
Washington, D.C. 20004
Telephone: (202) 637-5600
benjamin.holt@hoganlovells.com
adam.levin@hoganlovells.com
justin.bernick@hoganlovells.com

/s/ Jasmeet K. Ahuja
Jasmeet K. Ahuja
HOGAN LOVELLS US LLP
1735 Market Street, 23rd Floor
Philadelphia, PA 19103
Telephone: (267) 675-4600
jasmeet.ahuja@hoganlovells.com

*Counsel for Defendants Mylan Inc.;
Mylan Pharmaceuticals Inc.; and UDL
Laboratories, Inc.*

/s/ Sheron Korpus

Sheron Korpus
Seth A. Moskowitz
Seth Davis
David M. Max
KASOWITZ BENSON TORRES LLP
1633 Broadway
New York, New York 10019
Telephone: (212) 506-1700
skorpus@kasowitz.com
smoskowitz@kasowitz.com
sdavis@kasowitz.com
dmax@kasowitz.com

*Counsel for Defendants Actavis Holdco
U.S.; Inc.; Actavis Elizabeth, LLC; and
Actavis Pharma, Inc.*

/s/ Steven A. Reed

R. Brendan Fee
Steven A. Reed
Melina R. DiMattio
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103
Telephone: (215) 963-5000
Facsimile: (215) 963-5001
brendan.fee@morganlewis.com
steve.reed@morganlewis.com
melina.dimattio@morganlewis.com

Wendy West Feinstein
MORGAN, LEWIS & BOCKIUS LLP
One Oxford Centre, Thirty-Second Floor
Pittsburgh, PA 15219
Telephone: (412) 560-7455
Facsimile: (412) 560-7001
wendy.feinstein@morganlewis.com

*Counsel for Defendant Glenmark
Pharmaceuticals Inc., USA*

/s/ Bryan D. Gant

Heather K. McDevitt
Bryan D. Gant
WHITE & CASE LLP
1221 Avenue of the Americas
New York, New York 10020
Tel.: (212) 819-8200
Fax: (212) 354-8113
hmcdevitt@whitecase.com
bgant@whitecase.com

Counsel for Defendant Teligent, Inc.

/s/ Saul P. Morgenstern

Saul P. Morgenstern
Margaret A. Rogers
**ARNOLD & PORTER KAYE
SCHOLER LLP**
250 W. 55th Street
New York, NY 10019
Telephone: (212) 836-8000
Facsimile: (212) 836-8689
margaret.rogers@arnoldporter.com
saul.morgenstern@arnoldporter.com

Laura S. Shores
**ARNOLD & PORTER KAYE
SCHOLER LLP**
601 Massachusetts Avenue
Washington, DC 20001
Telephone: (202) 942-5000
laura.shores@arnoldporter.com

*Counsel for Defendants Sandoz, Inc. and
Fougera Pharmaceuticals Inc.*

/s/ Leiv Blad

Leiv Blad
Zarema Jaramillo
Meg Slachetka
LOWENSTEIN SANDLER LLP
2200 Pennsylvania Avenue
Washington, D.C. 20037
Telephone: (202) 753-3800
Facsimile: (202) 753-3838
lblad@lowenstein.com
zjaramillo@lowenstein.com
mslachetka@lowenstein.com

*Counsel for Defendant Lupin
Pharmaceuticals, Inc.*

/s/ Heather P. Lamberg

Heather P. Lamberg
Keith R. Palfin
WINSTON & STRAWN LLP
1901 L Street, NW
Washington, D.C. 20036
Telephone: (202) 282-5000
Facsimile: (202) 282-5100
hlamberg@winston.com
kpalfin@winston.com

*Counsel for Defendant Camber
Pharmaceuticals, Inc.*

/s/ John E. Schmidtlein

John E. Schmidtlein
Sarah F. Kirkpatrick
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 434-5000
Facsimile: (202) 434-5029
jschmidtlein@wc.com
skirkpatrick@wc.com

*Counsel for Defendants Par
Pharmaceutical, Inc. and DAVA
Pharmaceuticals, LLC.*

/s/ Mark A. Robertson

Robin D. Adelstein
Mark A. Robertson
**NORTON ROSE FULBRIGHT US
LLP**
1301 Avenue of the Americas
New York, NY 10019-6022
Telephone: (212) 318-3000
Facsimile: (212) 408-5100
robin.adelstein@nortonrosefulbright.com
mark.robertson@nortonrosefulbright.com

*Counsel for Defendants Bausch Health
Americas, Inc.; Bausch Health US LLC,
f/k/a Valeant Pharmaceuticals North
America LLC; and Oceanside
Pharmaceuticals, Inc.*

/s/ Raymond A. Jacobsen, Jr.

Raymond A. Jacobsen, Jr.
Paul M. Thompson (Pa. Bar No. 82017)
Lisa (Peterson) Rumin
MCDERMOTT WILL & EMERY LLP
500 North Capitol Street, NW
Washington, D.C. 20001
Telephone: (202) 756-8000
rayjacobsen@mwe.com
pthompson@mwe.com
lrumin@mwe.com

Nicole L. Castle
MCDERMOTT WILL & EMERY LLP
340 Madison Avenue
New York, NY 10173
Telephone: (212) 547-5400
ncastle@mwe.com

*Counsel for Defendants Amneal
Pharmaceuticals, Inc.; Amneal
Pharmaceuticals LLC; and Impax
Laboratories, Inc.*

/s/ Devora W. Allon, P.C.

Devora W. Allon, P.C.
Jay P. Lefkowitz, P.C.
Alexia R. Brancato
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
jay.lefkowitz@kirkland.com
devora.allon@kirkland.com
alexia.brancato@kirkland.com

*Counsel for Defendant Upsher-Smith
Laboratories, LLC*

/s/ Wayne A. Mack

Wayne A. Mack
Sean P. McConnell
Sarah O'Laughlin Kulik
DUANE MORRIS LLP
30 S. 17th Street
Philadelphia, PA 19103
Telephone: (215) 979-1152
wamack@duanemorris.com
spmccconnell@duanemorris.com
sckulik@duanemorris.com

*Counsel for Defendant Aurobindo
Pharma USA, Inc.*

/s/ J. Gordon Cooney, Jr.

J. Gordon Cooney, Jr.
John J. Pease, III
Alison Tanchyk
William T. McEnroe
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103
Telephone: (215) 963-5000
Facsimile: (215) 963-5001
jgcooney@morganlewis.com
john.pease@morganlewis.com
alison.tanchyk@morganlewis.com
william.mcenroe@morganlewis.com

Amanda B. Robinson
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, NW
Washington, D.C. 20004
Telephone: (202) 739-3000
Facsimile: (202) 739-3001
amanda.robinson@morganlewis.com

*Counsel for Defendants Teva
Pharmaceuticals USA, Inc. and Barr
Pharmaceuticals, LLC*

/s/ Damon W. Suden

William A. Escobar
Damon W. Suden
Clifford Katz
KELLEY DRY & WARREN LLP
101 Park Ave
New York, New York 10178
Telephone: (212) 808-7800
Facsimile: (212) 808-7987
wescobar@kelleydrye.com
dsuden@kelleydrye.com
ckatz@kelleydrye.com

*Counsel for Defendants Wockhardt USA
LLC and Morton Grove Pharmaceuticals,
Inc.*

/s/ Ilana H. Eisenstein

Ilana H. Eisenstein
Ben C. Fabens-Lassen
DLA PIPER LLP (US)
1650 Market Street, Suite 5000
Philadelphia, PA 19103
Telephone: (215) 656-3300
ilana.eisenstein@dlapiper.com
ben.fabens-lassen@dlapiper.com

Edward S. Scheidman
DLA PIPER LLP (US)
500 Eighth Street, NW
Washington, DC 20004
Telephone: (202) 799-4000
edward.scheidman@dlapiper.com

Counsel for Defendant Pfizer Inc.

/s/ Brian J. Smith

Michael Martinez
Steven Kowal
Lauren Norris Donahue
Brian J. Smith
K&L GATES LLP
70 W. Madison St., Suite 3300
Chicago, IL 60602
Telephone: (312) 372-1121
Fax (312) 827-8000
michael.martinez@klgates.com
steven.kowal@klgates.com
lauren.donahue@klgates.com
brian.j.smith@klgates.com

*Counsel for Defendant Mayne Pharma
Inc.*

/s/ Jan P. Levine

Jan P. Levine
Robin P. Sumner
Michael J. Hartman
**TROUTMAN PEPPER HAMILTON
SANDERS LLP**
3000 Two Logan Square
Eighteenth & Arch Streets
Philadelphia, PA 19103-2799
Telephone: (215) 981-4000
Fax: (215) 981-4750

*Counsel for Defendants West-Ward
Columbus Inc; West-Ward
Pharmaceuticals Corp. (n/k/a Hikma
Pharmaceuticals USA, Inc.); Hikma Labs
Inc.; and Hikma Pharmaceuticals USA,
Inc. (f/k/a West-Ward Pharmaceuticals
Corp.)*

/s/ Jeremy A. Rist

Jeremy A. Rist
BLANK ROME LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103
Telephone: (215) 569-5361
Facsimile: (215) 832-5361
Rist@BlankRome.com

Lisa M. Kaas (pro hac vice)
BLANK ROME LLP
1825 Eye Street NW
Washington, DC 20006
Telephone: (202) 420-2200
Facsimile: (202) 420-2201
LKaas@BlankRome.com

*Counsel for Defendant Jubilant Cadista
Pharmaceuticals, Inc.*

/s/ Roger B. Kaplan

Roger B. Kaplan
Jason Kislin
Aaron Van Nostrand
GREENBERG TRAURIG, LLP
500 Campus Drive, Suite 400
Florham Park, NJ 07932
Telephone: (973) 360-7957
Facsimile: (973) 295-1257
kaplanr@gtlaw.com
kislinj@gtlaw.com
vannostranda@gtlaw.com

Brian T. Feeney
GREENBERG TRAURIG, LLP
1717 Arch St., Suite 400
Philadelphia, PA 19103
Telephone: (215) 988-7812
Facsimile: (215) 717-5265
feeneyb@gtlaw.com

*Counsel for Defendant Dr. Reddy's
Laboratories, Inc.*

/s/ Heather K. McDevitt

Heather K. McDevitt
Bryan D. Gant
WHITE & CASE LLP
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
hmcdevitt@whitecase.com
bgant@whitecase.com

Counsel for Defendant Teligent, Inc.

/s/ Stacy Anne Mahoney
Stacey Anne Mahoney
Grant R. MacQueen
Victoria Peng-Rue
Sarah E. Hsu Wilbur
MORGAN LEWIS & BOCKIUS LLP
101 Park Avenue
New York, New York 10178
Telephone: (212) 309-6000
Facsimile: (212) 309-6001
stacey.mahoney@morganlewis.com
grant.macqueen@morganlewis.com
victoria.pengrue@morganlewis.com
sarah.wilbur@morganlewis.com

*Counsel for Defendant Breckenridge
Pharmaceutical, Inc.*

/s/ Ryan T. Becker
Gerald E. Arth
Ryan T. Becker
Nathan Buchter
FOX ROTHSCCHILD LLP
2000 Market Street, 20th Floor
Philadelphia, PA 19103
Telephone: (215) 299-2000
Facsimile: (215) 299-2150
garth@foxrothschild.com
rbecker@foxrothschild.com
nbuchter@foxrothschild.com

George G. Gordon
Julia Chapman
DECHERT LLP
2929 Arch Street
Philadelphia, PA 19104
Telephone: (215) 994-2382
Facsimile: (215) 994-2382
george.gordon@dechert.com
julia.chapman@dechert.com

*Counsel for Defendant Lannett Company,
Inc.*

/s/ Craig M. Reiser

Michael L. Keeley
Rachel J. Adcox
**AXINN, VELTROP & HARKRIDER
LLP**
950 F Street, NW
Washington, DC 20004
Telephone: (202) 912-4700
Facsimile: (202) 912-4701
mkeeley@axinn.com
radcox@axinn.com

Edward M. Mathias
**AXINN, VELTROP & HARKRIDER
LLP**
90 State House Square
Hartford, CT 06013
Telephone: (860) 275-8112
Facsimile: (860) 275-8101
tmathias@axinn.com

Craig M. Reiser
**AXINN, VELTROP & HARKRIDER
LLP**
114 West 47th Street
New York, NY 10036
Telephone: (212) 728-2218
Facsimile: (212) 261-5654
creiser@axinn.com

Counsel for Defendant Alvogen, Inc.

/s/ Erik T. Koons

John M. Taladay
Erik T. Koons
Stacy L. Turner
Christopher P. Wilson
BAKER BOTTS LLP
700 K Street, NW
Washington, DC 20004
Telephone: (202) 639-7700
Facsimile: (202) 639-7890
erik.koons@bakerbotts.com
john.taladay@bakerbotts.com
stacy.turner@bakerbotts.com
christopher.wilson@bakerbotts.com

Lauri A. Kavulich
Ann E. Lemmo
CLARK HILL PLC
2001 Market St, Suite 2620
Philadelphia, PA 19103
Telephone: (215) 640-8500
Facsimile: (215) 640-8501
lkavulich@clarkhill.com
alemmono@clarkhill.com

Lindsay S. Fouse
CLARK HILL PLC
301 Grant St, 14th Floor
Pittsburgh, PA 15219
Telephone: (412) 394-7711
Facsimile: (412) 394-2555
lfouse@clarkhill.com

*Counsel for Defendants Sun
Pharmaceutical Industries, Inc. and
Caraco Pharmaceutical Laboratories
Ltd.*

/s/ J. Clayton Everett, Jr.

Scott A. Stempel
J. Clayton Everett, Jr.
Tracey F. Milich
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, NW
Washington, D.C. 20004
Telephone: (202) 739-3000
Facsimile: (202) 739-3001
scott.stempel@morganlewis.com
clay.everett@morganlewis.com
tracey.milich@morganlewis.com

Harvey Bartle IV
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103
Telephone: (215) 963-5000
Facsimile: (215) 963-5001
harvey.bartle@morganlewis.com

Counsel for Defendant Perrigo New York, Inc.

/s/ Steven E. Bizar

Steven E. Bizar
John P. McClam
Tiffany E. Engsell
DECHERT LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104
Telephone: (215) 994-2000
steven.bizar@dechert.com
john.mcclam@dechert.com
tiffany.engsell@dechert.com

Counsel for Defendant Citron Pharma LLC

/s/ Adam Hemlock

Adam Hemlock
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, NY 10153
Tel: (212) 310-8000
Fax: (212) 310-8007
adam.hemlock@weil.com

Counsel for Defendant Torrent Pharma Inc.

/s/ Edward B. Schwartz

Edward B. Schwartz
Andrew C. Bernasconi
REED SMITH LLP
1301 K Street NW
Suite 1000
Washington, DC 20005
Telephone: 202-414-9200
eschwartz@reedsmith.com
abernasconi@reedsmith.com

Nicholas V. Albu
REED SMITH LLP
7900 Tysons One Place
Suite 500
McLean, VA 22102
Telephone: 703-641-4200
nalbu@reedsmith.com

Counsel for Defendant Heritage Pharmaceuticals Inc.

/s/ James W. Matthews

James W. Matthews
Katy E. Koski
John F. Nagle
FOLEY & LARDNER LLP
111 Huntington Avenue
Boston, Massachusetts 02199
Telephone: (617) 342-4000
jmatthews@foley.com
kkoski@foley.com
jnagle@foley.com

James T. McKeown
Elizabeth A. N. Haas
Kate E. Gehl
FOLEY & LARDNER LLP
777 E. Wisconsin Avenue
Milwaukee, WI 53202
Telephone: (414) 271-2400
jmckeown@foley.com
ehaas@foley.com
kgehl@foley.com

Steven F. Cherry
April N. Williams
Claire Bergeron
**WILMER CUTLER PICKERING
HALE AND DORR LLP**
1875 Pennsylvania Avenue, NW
Washington, D.C. 20006
Telephone: (202) 663-6000
steven.cherry@wilmerhale.com
april.williams@wilmerhale.com
claire.bergeron@wilmerhale.com

Terry M. Henry
Melanie S. Carter
BLANK ROME LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103
Telephone: (215) 569-5644
thenry@blankrome.com
mcarter@blankrome.com

Counsel for Defendant Apotex Corp.

/s/ Jason R. Parish

Jason R. Parish
Martin J. Amundson
**BUCHANAN INGERSOLL &
ROONEY PC**
1700 K Street, NW, Suite 300
Washington, DC 20006
Telephone: (202) 452-7900
Facsimile: (202) 452-7989
jason.parish@bipc.com
martin.amundson@bipc.com

Bradley Kitlowski
**BUCHANAN INGERSOLL &
ROONEY PC**
Union Trust Building
Pittsburgh, PA 15219
Telephone: (412) 562-8800
Facsimile: (412) 562-1041
bradley.kitlowski@bipc.com

*Counsel for Defendant Zydus
Pharmaceuticals (USA) Inc.*